

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI**

CERTAIN UNDERWRITERS AT )  
LLOYD'S, LONDON SUBSCRIBING )  
TO POLICY PGIARK03780-02, as subrogee of )  
ROESLEIN ALTERNATIVE ENERGY, )  
LLC. )  
 )  
Plaintiff, )  
 )  
v. ) Case No. 4:24-CV-00512  
 )  
THE CINCINNATI INDEMNITY COMPANY )  
And INDUSTRIAL & ENVIRONMENTAL )  
CONCEPTS, INC., )  
 )  
Defendant. )

**DEFENDANTS THE CINCINNATI INDEMNITY COMPANY AND  
INDUSTRIAL & ENVIRONMENTAL CONCEPTS, INC.'S  
MOTION FOR JUDGMENT ON THE PLEADINGS**

Defendants The Cincinnati Indemnity Company and Industrial & Environmental Concepts, Inc. move this Court under FED. R. CIV. P. 12(c) and Local Rule 4.01(A) for an Order entering Judgment on the pleadings in favor of Defendants and against Plaintiff. Defendants breached no contract with or fiduciary duty to Plaintiff.

In support, Defendants submit together with this Motion a Memorandum in Support, which Defendants incorporate by reference.

**WALLACE SAUNDERS**

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**ATTORNEYS FOR DEFENDANTS  
THE CINCINNATI INDEMNITY  
COMPANY AND INDUSTRIAL &  
ENVIRONMENTAL CONCEPTS, INC.**

**CERTIFICATE OF SERVICE**

I certify that on the 19<sup>th</sup> day of June, 2024, I electronically filed the foregoing with the Clerk of the Court using the e-filing system which will send notification of such filing to the following participants:

M. Courtney Koger  
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ATTORNEYS FOR PLAINTIFF

/s/Thomas A. Fiegener  
For the Firm